



Interstate Telcom Consulting, Inc.

Independent Telecommunications Consultants

June 28, 2012

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Ms. Karen Majcher
Vice President - High Cost Low Income Division
Universal Service Administrative Company
2000 L Street NW, Suite 200
Washington, DC 20036

Mr. Jeff Richter
PSC - Wisconsin
PO Box 7854
Madison, WI 53707

Re: WC Docket No. 10-90: Annual Reporting Requirements for High-cost Recipients
§54.313(a)(1) through (a)(8) and (h)

Pursuant to Section 54.313(a)(1) through (a)(8) and (h) of the Federal Communications Commission's rules, enclosed are the 2012 annual reporting requirements and certifications for Vernon Telephone Cooperative, Study Area Code 330966. Vernon Telephone Cooperative is a state-designated ETC, and as such, is submitting to the Commission relevant information from reports it files with its state commission for §54.313(a)(1) through (a)(8) and (h).

Should you have any questions, please contact me via e-mail at roxih@interstatetelcom.com or by phone at 320/848-6641.

Sincerely,

Roxi Hacker
Regulatory Consultant

Enclosures:

Cc: Rod Olson

Vernon Telephone Company

Annual Reporting for High-Cost Recipients

47 C.F.R. 54.313(a)(1) through (a)(8) and (h)

SERVICE QUALITY IMPROVEMENT PLAN – 54.313(a)(1)

A progress report on its five-year service quality improvement plan pursuant to 54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year. The information shall be submitted at the wire center level or census block as appropriate.

- **Wisconsin Public Service Commission does not require a five-year service quality improvement plan**
- **Vernon Telephone Company's service quality improvement plan is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout Vernon Telephone Company's service area. As an incumbent local carrier Vernon Telephone Company upgrades and replaces facilities and equipment as necessary.**
- **See Attachment #1 for monetary detail. (Attachment is filed as a Non-Public Document)**

OUTAGE REPORTING – 54.313(a)(2)

Detailed information on any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (i) at least ten percent of the end users served in a designated service area; or (ii) a 911 special facility as defined in 47 C.F.R. 4.5(e).

- **Wisconsin Public Service Commission does not require this information to be filed and therefore no information is available to report for 2011.**

UNFULFILLED SERVICE REQUESTS – 54.313 (a)(3)

The number of requests for service from potential customers, within the recipient's service areas, that were unfulfilled during the prior calendar year.

- **Wisconsin Public Service Commission does not require this information to be filed and therefore no information is available to report for 2011.**

NUMBER OF CUSTOMER COMPLAINTS PER 1,000 CONNECTIONS – 54.313(a)(4)

The total number of customer complaints (per 1,000 connections (fixed or mobile)) from the prior calendar year.

- **Wisconsin Public Service Commission does not require this information to be filed and therefore no information is available to report for 2011.**

SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES – 54.313(a)(5)

By signing below, I certify that **Vernon Telephone Company, SAC 330966**, is in compliance with applicable service quality standards and consumer protection rules.

ABILITY TO FUNCTION IN EMERGENCY SITUATIONS – 54.313(a)(6)

By signing below, I certify that **Vernon Telephone Company, SAC 330966**, can function in emergency situations as set forth in 47 C.F.R. 54.202(a)(2). Specifically, **Vernon Telephone Company** has a reasonable amount of back-up power to ensure functionality, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

CURRENT PRICE OFFERINGS – 54.313(A)(7)

The company's price offerings in a format as specified by the Wireline Competition Bureau.

- **The Wireline Competition Bureau has not established a format for the requested information, as specified in 54.313.(a)(2)(iii)(F)(7), nor has this provision received Office of Management and Budget (OMB) approval as of the date of this filing. Therefore, no response is required at this time.**

COMPANY IDENTIFICATION – 54.313(a)(8)

The recipient's holding company, operating companies, affiliates, and any branding, as well as universal service identifiers for each such entity by Study Area Codes, as that term is used by the Administrator. For purposes of this paragraph, "affiliates" has the meaning set forth in section 3(2) of the Communications Act of 1934, as amended.

- **This provision has not received Office of Management and Budget (OMB) approval as of the date of this filing. Therefore, the requested information will be filed when appropriate.**

ADDITIONAL VOICE RATE DATA – 54.313(h)

All incumbent local exchange carriers receiving high-cost support must report all rates for residential local service, as well as state fees as defined pursuant to 54.318(e) that are below the local urban rate floor as defined in 54.318, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1.

- **Vernon Telephone Company does not have any rates that fall beneath the \$10.00 rate floor.**

CERTIFICATION –COMPANY OFFICER

I, Rodney D. Olson certify that I am an officer of Vernon Telephone Company. I certify via my signature below, under penalty of perjury to the accuracy of the information provided herein and qualify the certifications required by 47 C.F.R. 54.313.



Signature of Officer

Rodney D. Olson

Printed Name of Officer

General Manager

Title of Officer

6/26/2012

Date